IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

2004 AUG 27 - AM St 31

CHIQUITA LEE, MELISSA ORTIZ)	Judge Campbell
CUCCIO, and LULA B. WADE)	
on behalf of themselves and)	Magistrate Judge Griffin
all others similarly situated,)	
Plaintiffs,)	Class Action
)	No. 3-02-0570
v.)	
)	
WFS FINANCIAL, INC., a California)	
corporation,)	
)	
Defendant.)	

NOTICE OF FILING DOCUMENTS IN SUPPORT OF PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT

Come now the plaintiffs, by and through class counsel, and give notice of the filing of the following documents and materials in support of preliminary approval of the settlement agreement which is set for a preliminary hearing before the Court on August 27, 2004¹:

- 1. Settlement Agreement with exhibits;
- Joint Declaration of Class Counsel in Support of the Proposed Class Action
 Settlement in Lee v. WFS Financial (M.D. Tenn.) ("federal action");
- Joint Declaration of Class Counsel in Support of the Proposed Class Action
 Settlement in *Thompson v. WFS, Inc.* (Cal.)("California action");

¹The original of California counsels' Joint Declaration will be submitted to the Court before or at the time of the preliminary approval hearing. Further documentation concerning other aspects of the settlement, including an itemization of expenses, will be submitted to the Court by plaintiffs before any final approval of the proposed settlement.



- 4. Declaration of proposed class representative Chiquita Lee in federal action;
- 5. Declaration of proposed class representative Melissa Ortiz Cuccio in federal action;
- 6. Declaration of proposed class representative Lula B. Wade in federal action;
- 7. Declaration of proposed class representative Michelle G. Thompson in California action;
- 8. Declaration of proposed class representative Joaquin Andrade in California action;
- 9. Declaration of proposed class representative Jose J. Duran in California action;
- 10. Unopposed Motion for Admission Pro Hac Vice of Bill Lann Lee;
- 11. Unopposed Motion for Admission Pro Hac Vice of Linda Dardarian.

RESPECTFULLY SUBMITTED: ATTORNEYS for PLAINTIFFS

WYMAN O. GILMORE (PRN 19906)

Gilmore Law Office 116 Court Street P.O. Box 729 Grove Hill, AL 36451 (251) 275-3115

MICHAEL E. TERRY (BPRN 3856)

Terry & Gore 209 Tenth Avenue South Suite 310 Cummins Station Nashville, TN 37203 (615) 256-5555 CLINT W. WATKINS (BPRN 15728) Law Office of Clint W. Watkins 5214 Maryland Way Suite 402 Brentwood, TN 37027

Brentwood, TN 37027 (615) 376-7000

RICHARD T. DORMAN (pro hac vice)

JOHN T. CROWDER, JR. (pro hac vice)

ROBERT TO CUNNINGHAM, JR. (pro hac vice)

DAVID G. WIRTES, JR. (pro hac vice)

R. EDWIN LAMBERTH (pro hac vice)

Cunningham, Bounds, Yance, Crowder

& Brown, L.L.C.

Post Office Box 66705

Mobile Alabama 36660

Mobile, Alabama 36660 (251) 471-6191

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the day of August, 2004, a true and exact copy of the foregoing document has been forwarded to the person(s) listed below:		
Wallace Wordsworth Dietz		
Anna M. Grizzle		
Bass, Berry & Sims		
315 Deaderick Street		
Suite 2700		
Nashville, Tennessee 37238-0002		
☐ Sent via U.S. Mail		
Sent via Hand Delivery		
☐ Sent via Certified U.S. Mail		
□ Sent via Facsimile		
C. Jay Thompson		
Morrison & Foerster, LLP		
425 Market Street		
San Francisco, California 94105-2482		
☐ Sent via U.S. Mail		
Sent via Hand Delivery Sent via Certified U.S. Mail		
Sent via Facsimile		
Sent via facsinine		

hp. 2. Oh.